HUMBOLDT BAYKEEPER®

April 4, 2014

Katharine Carter
North Coast Regional Water Quality Control Board
5550 Skylane Blvd, Suite A
Santa Rosa, CA 95403
Katharine.Carter@waterboards.ca.gov

Re: Release of North Coast Regional Water Quality Control Board "Public Review Draft Staff Report for the 2012 Integrated Report" (March 14, 2014)

Dear Ms. Carter,

Thank you for the opportunity to comment on the Public Review Draft Staff Report for the 2012 Integrated Report. We are pleased that staff is recommending listing several waterbodies as Impaired by indicator bacteria as recommended in our comments and data submitted on August 30, 2010.

Humboldt Baykeeper was launched in 2004 with a mission to safeguard coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community through education, scientific research, and enforcement of laws to fight pollution.

Since its inception, Humboldt Baykeeper's Citizen Monitoring Program has collected water quality data from sites throughout the Humboldt Bay, Mad River, and Little River watersheds. In 2005, 10 sites were sampled, and in 2009 we expanded our monitoring to 35 sites within 15 waterbodies. Our first five years of monitoring efforts included Dry Weather and First Flush paired samples, as well as several late spring monitoring events. Numerous waterbodies in the Humboldt Bay, Mad River, and Little River watersheds were found to have quite high levels of fecal coliform (*E. coli*), particularly after major rain events.

I am writing to supplement comments already submitted by Humboldt Baykeeper for the preparation of the 2010 Clean Water Act (CWA) 303(d) List related to the impaired condition of several local waterbodies by indicator bacteria. In 2012, we focused more intensively on Jolly Giant Creek, which flows into Humboldt Bay, with the goal of identifying hot spots within one watershed.

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This past winter, we conducted a loading study to determine which of four Arcata creeks is discharging the highest volume of fecal coliform into Humboldt Bay.

Since the submittal of our original comments, additional data is available that should be included in the assessment of water quality of the Humboldt Bay tributaries included in our 2010 submission. These data include sampling conducted by Humboldt Baykeeper staff and volunteers in February and October of 2012, October of 2013, and February of 2014. We believe these data further support the inclusion of these waterbodies on the CWA 303(d) List as impaired for indicator bacteria.

Below is a summary of these additional data.

- **Martin's Slough/Lower Elk River:** 5 of 6 *E. coli* samples exceed 400 MPN/100ml, with a maximum of >2,419 MPN/100ml documented (83%).
- **Jolly Giant Creek:** 13 of 16 *E. coli* samples exceed 400 MPN/100ml, with a maximum of >241,960 MPN/100ml documented (81%).
- **Campbell Creek:** 4 of 4 *E. coli* samples exceed 400 MPN/100ml, with a maximum of 1,210 MPN/100ml documented (100%).

Humboldt Baykeeper believes that the data submitted from the above-mentioned project is complete and accurate for listing purposes. Our Citizen Monitoring Program operates under the QAPP approved in 2004 for Redwood Community Action Agency, our partner in the 2005 First Flush monitoring event. It meets the guidelines detailed in the QAPP. We will be glad to assist the Regional Board in reviewing the data if there are any questions regarding its development or quality. Thank you for the opportunity to submit our comments on this important issue.

Sincerely,

__s/_____

Jennifer Kalt
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Attachments:

Excel Spreadsheet with fecal coliform results from Feb. 2012 to Feb. 2014
Data Submission Form